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June 2, 2008

BY ECF

Hon. Lawrence A. Kaplan  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: United States v. Reynold Orozco  
08 Cr. 52 (LAK)

Dear Judge Kaplan:

This letter is respectfully submitted on behalf of the defendant, Reynold Orozco, to request that the date for filing motions in the above-captioned matter be extended from June 20, 2008 to July 11, 2008.

The requested extension is necessary because the defendant, who is incarcerated at the Metropolitan Correctional Center, is currently in quarantine as a result of an outbreak of chicken pox at that facility. I attempted to visit Mr. Orozco on May 30, to consult with him about potential motions, but was not allowed to see him as a result of the quarantine. I was advised by the officer on duty that the quarantine will be in effect for a minimum of three weeks, i.e., until at least June 20, the current deadline for filing motions. Based on my recent experience with a similar quarantine at the Metropolitan Detention Center, it is likely that the quarantine will last longer than three weeks, because every time a new case of chicken pox comes forward, the three-week quarantine period begins anew. Additionally, I will be out of town on vacation between June 19-26 and thus, even if the quarantine is lifted on June 20, I will not be able to consult with Mr. Orozco before June 27.

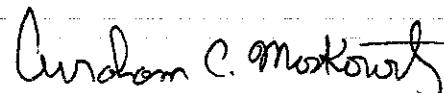
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In light of the above, it is respectfully requested that the deadline for filing motions on behalf of the defendant be extended to July 11, 2008.

I have spoken to AUSA Michael Maimin, and he has advised me that the Government has no objection to the requested extension.

Thank you in advance for your consideration of this request.

Respectfully submitted,



Avraham C. Moskowitz

ACM:bgb  
cc: AUSA Michael Maimin